



Program Requirements Comparison

NATIONAL ENVIRONMENTAL PERFORMANCE TRACK and COLORADO ENVIRONMENTAL LEADERSHIP PROGRAM



National Environmental Performance Track and the Colorado Environmental Leadership Program are voluntary programs designed to foster and reward environmental excellence. Performance Track is a national EPA program and Colorado Environmental Leadership Program is a statewide CPDHE program. This fact sheet summarizes and compares requirements for the two programs. For additional information on these programs or incentives, see program web sites or contact program coordinators.

Common Program Requirements:

- *EMS Components:* Requires an EMS with a written policy approved by management, planned targets and goals, and plans for checking and correcting non-conformance issues.
 - *EMS Requirements:* Requires that facilities have an EMS in place.
 - *Compliance Record:* Strong environmental compliance record required.
 - *Compliance Audit:* Requires compliance audit program to assess compliance, correct non-compliance, and report audit findings.
 - *Scalability:* Requirements are scalable and goals are expected to reflect the size of the facility.
 - *Site Visits:* Must maintain an open-door policy for program officials to conduct site visits.
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Colorado Environmental Leadership- Additional Requirements:

- *Pollution Prevention Program*: Requires the existence of a plan with specific goals for reducing pollution and resource use beyond legal requirements.
- *Past Performance*: Must document performance for a number of aspects over the past two years. Specific number of aspects vary with facility's environmental requirements.
- *Future Performance*: Requires facility to choose a number of the following elements based on facility size:
 - *Mentoring*: Encourage technology transfers to specified organizations.
 - *Participation in Industry or Business Environmental Improvement Programs*.
 - *Participation in Recognized Voluntary Environmental Programs*.
 - *Annual Report*: Publication and distribution of report summarizing environmental performance.
 - *Community Outreach*: Promotion, sponsorship, and participation in community environmental and advisory programs.
 - *Management Programs*: Encourage and reward employees for exemplary environmental achievement.
 - *Reduce Impact of Products on Environment*
 - *EMS Revision*

Performance Track - Additional Requirements:

- *EMS Components*: Requirements include sharing EMS performance with the community and documented management review.
- *Self-Audits*: Annual EMS audits are required in addition to compliance audits; results must be made available to the public.
- *EMS Cycle*: One full cycle of the EMS must be complete.
- *Past Performance*: Requires a demonstration of two years of performance improvements within two specific aspects (e.g., water use, hazardous waste reduction, emissions of VOCs). Small businesses need only report on one aspect.
- *Future Performance*: Requires a commitment to future performance improvements in four specific aspects. Small businesses commit to only two aspects.
- *Compliance Record*: Facility must have fewer than three significant civil violations and no unresolved SNCs/SVs, as well as no criminal environmental violations for five years. Facilities with ongoing EPA litigation or EPA debarment are ineligible.
- *Self-Certification*: Compliance self-certification is required on application and on annual reports.
- *Annual Report*: Report must include EMS data and progress towards meeting goals.
- *Duration of Participation*: Membership is for 3 years.

Colorado Environmental Leadership- Additional Requirements:

- *National or International Environmental Certification or Self-Registration*.
- *Compliance Record*: No serious violations, settlement agreements, compliance or consent orders issued for serious violations for 3 years prior to application.
- *Self-Certification*: Application requires documentation of compliance and compliance assurance procedures and assessments.
- *Duration of Participation*: Unspecified.

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